

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOHN GILLANE,

Plaintiff,

vs.

MEGA LIFE AND HEALTH INSURANCE
COMPANY; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 3:08-cv-00230-LRH-RAM

STIPULATION AND ORDER TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
MOTION TO REMAND TO STATE COURT
(Second Request)

Plaintiff John Gillane and defendant The Mega Life and Health Insurance Company ("MEGA") (incorrectly sued as "Mega Life and Health Insurance Company") hereby stipulate and agree as follows:

1. Plaintiff filed his Motion to Remand on May 30, 2008 (Document 8).

2. Pursuant to LR 7-2(b) and Fed. R. Civ. P. 6(d), MEGA's response to Plaintiff's Motion to Remand was to be filed on or before Tuesday, June 17, 2008.

3. Plaintiff and MEGA previously agreed that the time for MEGA to respond to Plaintiff's Motion to Remand could be extended to and including Thursday, July 17, 2008.

4. On June 12, 2008, the Court approved the parties'

1 stipulation for a first extension of time for MEGA to respond to
2 Plaintiff's Motion to Remand. (Document 10.)

3 5. Since the parties submitted their stipulation seeking
4 approval of a first extension of time for MEGA to respond to
5 Plaintiff's Motion to Remand, MEGA has continued to investigate
6 the matters requested of it by Plaintiff and has shared documents
7 and information with Plaintiff. Plaintiff and MEGA continue to
8 discuss the facts presented in Plaintiff's complaint, and MEGA's
9 search for documents and other information is active and ongoing.
10 The parties desire to continue their informal evaluation of this
11 case and their exchange of documents and information, and believe
12 that additional time will assist those efforts. As such,
13 Plaintiff and MEGA now stipulate and agree that MEGA may have a
14 further extension of time, through and including Friday, August
15 8, 2008, to respond to Plaintiff's Motion to Remand.

16 6. This is the second request for additional time sought
17 by the parties with respect to Plaintiff's Motion to Remand.
18 This stipulation is not submitted for the purpose of delay, but
19 rather, as stated above, to provide all parties additional time
20 to consider facts and evidence regarding the basis for federal

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question removal, and to consider the possibility of claim resolution.

LAW OFFICES OF MATTHEW L. SHARP LEWIS AND ROCA LLP
and
LAW OFFICES OF CURTIS B.
COULTER

By: /s/ Curtis B. Coulter
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Dated: June 24, 2008

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THE MEGA LIFE AND HEALTH
INSURANCE COMPANY
Dated: June 24, 2008

IT IS SO ORDERED:



LARRY R. HICKS
UNITED STATES DISTRICT JUDGE

DATED: June 25, 2008